

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

<p>In re:</p> <p>AFH AIR PROS, LLC, <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 25-10356 (PMB)</p> <p>(Jointly Administered)</p>
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DECLARATION IN SUPPORT OF ORDINARY COURSE RETENTION

The undersigned hereby declares, under penalty of perjury, as follows:

1. I am a member, partner, or similar representative of the following firm (the "Firm"), which maintains offices at the address and phone number listed below:

Firm: Leake Andersson LLP

Address and Phone Number: 1100 Poydras St., Ste. 1700, New Orleans, LA 70163
(504) 585-7500

2. This Declaration is submitted in connection with an order of the United States Bankruptcy Court for the Northern District of Georgia (the "Order") authorizing the above-captioned debtors and debtors in possession (collectively, the "Debtors") to retain certain professionals in the ordinary course of business during the pendency of the Debtors' chapter 11 cases (the "Chapter 11 Cases"). Since March 16, 2025 (the "Petition Date"), the Debtors have requested that the Firm provide legal or other services (or continue to provide services) to the Debtors, and the Firm has agreed to provide such services.

¹ The last four digits of AFH Air Pros, LLC's tax identification number are 1228. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at <https://www.veritaglobal.net/AirPros>. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 150 S. Pine Island Road, Suite 200, Plantation, Florida 33324.



3. The Firm, through me, and other members, partners, associates, or employees of the Firm, has provided, and/or plans to provide, the following legal or other services to the Debtors from and after the Petition Date: Defense of claims asserted against Air Pros Services, LLC, Air Pros Services Holdings, LLC, and related entities, in two litigation matters entitled: (i) *Trey Annison et al. v. Douglas Anthony Perera et al.*, 21st Judicial District Court for Livingston Parish, Louisiana, Case No. 185874, Div. “D” (“Annison Lawsuit”); and (ii) *Jeffrey D. Tauzin et al. v. Douglas Anthony Perera et al.*, 17th Judicial District Court for Lafourche Parish, Louisiana, Case No. C-151539, Div. “C” (Tauzin Lawsuit”); and pursuit of reconventional demand/counterclaim against Trey Annison, Baylie Annison, and Dream Team Air Pros, LLC in the Annison Lawsuit.

4. To the best of my knowledge, information, and belief, formed after due inquiry: (i) except for the proposed retention of the Firm in these Chapter 11 Cases, the Firm does not currently provide services to any party in any matter related to these Chapter 11 Cases; and (ii) the Firm does not represent or hold an interest adverse to the Debtors.

5. Now or in the future, the Firm may provide services to certain creditors of the Debtors or other interested parties in matters unrelated to the Debtors, but in this regard, the Firm’s work for these clients will not include the provision of services on any matters relating to the Debtors’ Chapter 11 Cases.


6. The Firm is owed \$0.00 on account of services rendered and expenses incurred prior to the Petition Date in connection with the Firm’s employment by the Debtors, the payment of which is subject to limitations contained in title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”).

7. The Firm further states that it has not shared, has not agreed to share, nor will it agree to share, any compensation received in connection with these Chapter 11 Cases with any

party or person except to the extent permitted by the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure, although such compensation may be shared with any member or partner of, or any person employed by, the Firm.

8. If, at any time during its employment by the Debtors, the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

Dated: April 22, 2025

By: 
George D. Fagan